

State of New Jersey

OFFICE OF THE ATTORNEY GENERAL
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MICHELLE L. MILLER
Acting Director

November 24, 2015

Lt. Governor

CHRIS CHRISTIE

Governor

KIM GUADAGNO

Electronically Filed

SO ORDERED

s/James B. Clark

James B. Clark, U.S.M.J.

Honorable James B. Clark, III, U.S.M.J. Frank R. Lautenberg U.S. P.O. & Cthse 1 Federal Sq.
Newark, NJ 07102

Date: December 1,2015

Re: Kaci Hichox v. Christopher James Christie, et al. Civil Action No.: 15-7647

Dear Judge Clark:

This Office represents the Defendants Christopher James Christie, Mary E. O'Dowd, Christopher Rinn and Gary Ludgwig. The Defendants will file a motion to dismiss the Complaint in its entirety under $\underline{\text{Fed. R. Civ. P. }}12(b)(6)$. I have discussed with Edward Barocas, Esq., the attorney for the Plaintiff Kaci Hichox, a proposed schedule for this motion. Mr. Barocas and I have agreed to the following schedule, and pursuant to Local Rule 6.1(a), I respectfully request that the Court permit the parties to file their papers in accordance with this schedule:

- 1. Defendants' motion papers to be filed no later than Friday, January 15, 2016.
- 2. Plaintiff's response to the motion to be filed no later than Tuesday, March 15, 2016.
- 3. Defendants' reply to the opposition to be filed no later than Thursday, April 14, 2016.

Please note that this Office, in accordance with $\underline{\text{Fed. R.}}$ $\underline{\text{Civ. P.}}$ 4(d) and on behalf of each identified Defendant, executed a Waiver of the Service of Summons. The waivers were dated October 27, 2015. Accordingly, the Defendants' time to respond to the Complaint presently runs until December 26, 2015,

Case 2:15-cv-07647-KM-JBC Document 9 Filed 12/01/15 Page 2 of 2 PageID: 52

November 24, 2015 Page 2

and with a Clerk's extension under Local Rule 6.1(b) would not expire until January 8, 2016.

Please let me know if the above schedule for the motion is acceptable to the Court.

Respectfully,

JOHN J. HOFFMAN ACTING ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Kevin R. Jespersen
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KRJ:sb

Cc: Edward Barocas, Esq. (via email and electronic filing)
 Alan Sash, Esq. (via email and electronic filing)